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October 5, 2021

By ECF

Honorable Gabriel W. Gorenstein
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

In Re: *New York City Policing During Summer 2020 Demonstrations*,
No. 20 Civ. 8924 (CM) (GWG)
This filing is related to all cases

Your Honor:

I am a Senior Counsel in the Office of Georgia M. Pestana, Corporation Counsel of the City of New York, and I am among counsel for the defense in the above-referenced matter. I write in accordance with the Court's Individual Practices at Sections 2(A) through 2(B), to respectfully inform the Court that the parties have agreed to a further extension of defendants' time to respond to plaintiffs' letter filed on September 29, 2021 (Dkt no. 277), from today, October 5, 2021, until Friday, October 8, 2021.

Plaintiffs' Sept. 29 filing seeks a discovery conference regarding their requested Court Order to compel defendants to produce numerous items, including: (i) more than 30 categories of responsive documents that plaintiffs allege defendants have failed to produce thus far; (ii) a "complete" privilege log in connection with all past and future productions because the privilege log defendants previously provided was allegedly deficient; (iii) defendants' responses to the discovery requests served on them on August 3, 2021 by the *Sierra* plaintiffs; and (iv) video footage from NYPD's Aviation Unit that recorded protest activity from above.

The parties had previously agreed to extend defendants' time to respond to plaintiffs' Sept. 29 letter, from October 1, 2021, until today, October 5. *See* Letter from Dara Weiss to Magistrate Judge Gorenstein dated September 30, 2021 re: Date for Response to Plaintiffs' September 29, 2021 Letter (Dkt no. 278). Earlier today, the parties agreed to further extend defendants' time to respond from today until this Friday, October 8, 2021.

Thank you for your consideration herein.

Respectfully submitted,

Jenny Weng

Jenny Weng
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Special Federal Litigation Division

cc: ALL COUNSEL (via ECF only)